

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

RITA FOSTER)
)
PLAINTIFF,)
)
v.)
)
JOE A. LEE, JAMES PARKER,)
LEON FRAZIER, AND)
ALABAMA STATE UNIVERSITY,)
)
DEFENDANTS.)
)
C.A.N.: 2:07-CV-00247-MHT

REPORT OF PARTIES PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on May 7, 2007 and was attended by:
 - a. Thomas C. Tankersley for Plaintiff Rita Foster;
 - b. Kenneth L. Thomas and Ramadanah M. Salaam-Jones for Defendants Alabama State University and Dr. Joe A. Lee
 - c. Solomon S. Seay, Jr. for Defendant Leon Frazier
 - d. James Anderson for Defendant Willie James Parker
2. **Pre-Discovery disclosures:** The Parties will exchange pre-discovery disclosures by May 31, 2007 as required by Fed.R.Civ.P. 26(a)(1).
3. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

- a. All claims asserted by the Plaintiff.
- b. All defenses asserted by the Defendants.
- c. Any and all persons having knowledge, directly or indirectly, regarding the claims and defenses asserted in this lawsuit.
- d. All discovery commenced in time to be completed by February 1, 2008.
- e. Maximum of 30 interrogatories from each Defendant and 30 from the Plaintiff.

[Responses due in accordance with the Federal Rules of Civil Procedure.]

- f. Maximum of 30 requests for admissions by each party to any party. [Responses due in accordance with the Federal Rules of Civil Procedure.]
- g. Maximum of 10 depositions by Plaintiff and 10 by each Defendant. [Each deposition limited to maximum of eight hours unless extended by agreement of the parties.]

4. Other items:

- a. The parties do not request a conference with the Court before entry of the Scheduling Order.
- b. Pleadings may be amended without leave of the Court through June 15, 2007.
- c. Unless modified by stipulation of the parties, the disclosure of expert witnesses - including in a complete report under Fed.R.Civ.P. (26)(2)(b) from any specially retained or employed expert are due:
 - i. From the Plaintiff: 90 days prior to trial
 - ii. From the Defendants: 60 days prior to trial
- d. Pre-trial conferences: This case will be ready for pretrial conference in February of 2008.
- e. All potentially dispositive motions should be filed by December 31, 2007.

f. Final list of trial witnesses and exhibits under Fed.R.Civ.P. 26(a)(3) must be served and filed.

- i. By the Plaintiff: 30 days prior to trial
- ii. By the Defendants: 30 days prior to trial

Objections are to be filed within 14 days after receipt of final lists.

g. Trial: This case will be ready for trial during the March 31, 2008 trial term.

Trial is expected to last 3-4 day(s).

Respectfully Submitted,

/s/ Ramadana M. Salaam-Jones
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University and President Joe A. Lee

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